In view of the Appeal Brief filed on May 1, 2006, prosecution has been reopened by the Office and Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-14 and 32-44 are pending.

### 35 U.S.C. §103 Claim Rejections

**A.** Claims 1, 4, 9-14, 32-33, and 36-42 are rejected under 35 U.S.C. §103(a) for obviousness over U.S. Patent No. 6,138,178 to Watanabe (hereinafter, "Watanabe") in view of U.S. Patent No. 6,233,619 to Narisi et al. (hereinafter, "Narisi") (*Office Action* p.3).

**B.** Claims 2-3, 5-8, 34-35, and 43-44 are rejected under 35 U.S.C. §103(a) for obviousness over Watanabe and Narisi in view of the Background of Applicant's Specification (hereinafter, "Background") (*Office Action* p.7). Applicant respectfully traverses the rejections.

**Claim 1** recites (in part):

> A data communication system configured to communicatively link a host device and a remote client device with a point-to-point data communication link, the host device and the remote client device each configured for multipoint data communication over a distributed network, the data communication system comprising:
>
> a remote data communication interface driver of the host device implemented in the remote client device, the remote data communication interface driver configured to communicatively link with a data communication interface of the host device via the point-to-point data communication link; ...

Watanabe and/or Narisi do not teach or suggest a remote data communication interface driver of a host device implemented in a remote client device to communicatively link with a data communication interface of the host device via the point-to-point data communication link, as recited in claim 1.

With reference to Fig. 5 of the subject application, Applicant describes that a Remote NDIS miniport driver layer (530) of a host computing device (502) is implemented in a client device (504) (<u>instead of in the host computing device</u>) which facilitates a point-to-point communication link (506) between the two devices without having to configure the host computing device with interface components to communicate with the client device. The host computing device can be communicatively linked with any mobile client device <u>without having driver(s) for a particular device installed on the host computing device</u> (<em>Specification</em> p.14, lines 8-16; Fig. 5).

As described, an advantage to having remote devices implemented with a Remote NDIS miniport driver layer of a host computing device is that the host computing device does not need to then have the various and different driver(s) for the remote devices installed, but can still be communicatively linked with any number of the mobile client devices (<em>Specification</em> p.16, lines 6-12; Fig. 6).

Narisi is not cited by the Office for "a remote data communication interface driver of a host device implemented in a remote client device", as recited in claim 1. The Office then cites to Watanabe at col.7, lines 15-25 which describes that, when a device is connected to a controller device, a determination is made as to whether driver software to control the device is stored in the device. If the device does include the driver software, then it is transmitted from the device to

the device controller which "makes it possible for the operation of the device to be controlled by the device controller" (*Watanabe* Abstract; col.7, lines 15-25 and 43-58).

Claim 1 recites "a remote data communication interface driver of a host device implemented in a remote client device". In an opposite configuration, Watanabe describes driver software of a device implemented in a controller device. Contrary to the subject application, the device controller in Watanabe requires driver software which "makes it possible for the operation of the device to be controlled by the device controller" (*Watanabe* col.7, lines 52-58).

The Office also cites to Watanabe for "the remote data communication interface driver configured to communicatively link with a data communication interface of the host device" (*Office Action* p.3). If the basis for the rejection is applied to the system described in Watanabe, the driver software received by the device controller is utilized to communicatively link with a data communication interface of the device controller itself, <u>such that the device controller would then be configured to communicate with itself</u>. This proposed configuration is also contrary to a host device being communicatively linked to a remote client device with a point-to-point data communication link, as recited in claim 1.

Accordingly, claim 1 along with dependent claims 4 and 9-14 are allowable over the Watanabe-Narisi combination for at least these reasons, and Applicant requests that the §103 rejection be withdrawn.

**Claims 2-3 and 5-8** are allowable by virtue of their dependency upon claim 1 which is allowable over the Watanabe-Narisi combination for at least the

reasons described above in response to the §103 rejection of claim 1. Claims 2-3 and 5-8 are also allowable over the Watanabe-Narisi-Background combination because the Background clearly does not include "a remote data communication interface driver of a host device implemented in a remote client device", as recited in claim 1.

In the Background with reference to Fig. 4, Applicant describes a computing device (402) that includes a Remote NDIS miniport driver layer (414), and the computing device (402) is connected to a remote device (408) via a USB connection (*Background* p.6, lines 14-15; Fig. 4). There is no indication in the Background of a Remote NDIS driver of a host device implemented in a remote client device, as recited in claim 1. The Background is described with reference to Figs. 1-4, each of which include a computing device (e.g., host computing device) having communication components to communicate with client or remote devices via a communication link.

Fig.1 includes a host computing device (102) for conventional point-to-point communication with a client device (104) via a serial connection between serial ports of the two devices (*Background* p.3, lines 15-17). Similarly, Fig. 2 includes a host computing device (202) for point-to-point communication with a client device (204) via a point-to-point USB connection (*Background* p.3, lines 15-17).

Fig. 3 includes a computing device (302) having multipoint network data communication components for communication with network-connected device(s) via a LAN (310) (*Background* p.4, lines 12-14; p.6, lines 4-5). Fig. 4 includes the computing device (402) having the Remote NDIS miniport driver layer (414) for

communication with a remote device (408) via a USB connection (*Background* p.6, lines 14-15; Fig. 4).

Accordingly, the computing device (402) in Fig. 4 is the host computing device and the remote device (408) is the client device. The Background describes that a host computing device can include a Remote NDIS miniport driver layer (414). Only the Detailed Description then describes the claimed subject matter which includes implementing a host computing device's Remote NDIS driver layer in an external device (e.g., a client, a remote device, a portable device, and the like) (*Specification* p.10, line 19 to p.11, line 7; p.14, lines 8-16).

Accordingly, claims 2-3 and 5-8 are allowable over the Watanabe-Narisi-Background combination for at least these reasons, and the §103 rejection should be withdrawn.


**Claim 32** recites "implementing a remote network communication component of a host computing device in a remote client computing device".

As described above in response to the rejection of claim 1, Watanabe and/or Narisi do not teach or suggest implementing a remote network communication component of a host computing device in a remote client computing device, as recited in claim 32.

Accordingly, claim 32 along with dependent claims 33 and 36-42 are allowable over the Watanabe-Narisi combination, and Applicant requests that the §103 rejection be withdrawn.

**Claims 34-35 and 43-44** are allowable by virtue of their dependency upon claim 32 which is allowable over the Watanabe-Narisi combination for at least the reasons described above in response to the §103 rejection of claim 32. Claims 34-35 and 43-44 are also allowable over the Watanabe-Narisi-Background combination because the Background clearly does not include "implementing a remote network communication component of a host computing device in a remote client computing device", as recited in claim 32 (and as described above in response to the rejection of claims 2-3 and 5-8).

Accordingly, claims 34-35 and 43-44 are allowable over the Watanabe-Narisi-Background combination for at least these reasons, and the §103 rejection should be withdrawn.

## Conclusion

Pending claims 1-14 and 32-44 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. If any issues remain that preclude issuance of this application, the Examiner is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

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